

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DOMINGO RAMOS §
§
V. § CIVIL ACTION NO. SA09CA0721
§
ALAMO AREA COUNCIL OF §
GOVERNMENTS § JURY TRIAL DEMANDED

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Alamo Area Council of Governments (hereinafter referred to as "Defendant") files this Original Answer to Plaintiff's Original Complaint.

A. Admissions and Denials

1. Defendant admits jurisdiction as asserted in paragraph 1.
2. Defendant admits venue as asserted in paragraph 2.
3. No response is necessary to the allegations contained in paragraph 3.
4. Defendant admits that Alamo Area Council of Governments ("AACOG") is a governmental entity doing business in Bexar County, Texas.
5. Defendant admits paragraph 5.
6. Defendant does not have sufficient information or knowledge to either admit or deny the allegations contained in paragraph 6.
7. Defendant does not have sufficient information or knowledge to either admit or deny the allegations contained in paragraph 7.
8. Defendant does not have sufficient information or knowledge to either admit or deny the allegations contained in paragraph 8.
9. Defendant denies the allegations contained in paragraph 9.

10. Defendant does not have sufficient information or knowledge to either admit or deny the allegations contained in paragraph 10.
11. Defendant does not have sufficient information or knowledge to either admit or deny the allegations contained in paragraph 11 (both paragraphs).
12. Defendant denies a meeting took place on June 15, 2008, as alleged in paragraph 12; however, Defendant admits Ms. Arriaga stated appropriate action would be taken in response to Plaintiff's complaints.
13. Defendant admits the allegations contained in paragraph 13.
14. Defendant denies the allegations contained in paragraph 14.
15. Defendant admits Plaintiff forwarded an email to Defendant's Executive Director, which mentioned retaliation as alleged in paragraph 15.
16. Defendant denies the allegations contained in paragraph 16.
17. Defendant admits Plaintiff was re-assigned to the San Antonio office following a sexual harassment and another complaint against Plaintiff as alleged in paragraph 17.
18. Defendant denies the allegations contained in paragraph 18.
19. Defendant admits Plaintiff was secretly recording conversations at work but denies Plaintiff had a proper motive to do so as alleged in paragraph 19.
20. Defendant admits the allegation contained in paragraph 20.
21. Defendant denies the allegations contained in paragraph 21.
22. Defendant denies the allegations contained in paragraph 22.
23. Defendant denies the allegations contained in paragraph 23.
24. Defendant denies the allegations contained in paragraph 24.
25. Defendant denies the allegations contained in paragraph 25.

26. Defendant denies the allegations contained in paragraph 26.
27. Defendant denies the allegations and asserts its immunity from punitive damages contained in paragraph 27.
28. Defendant denies the allegations contained in paragraph 28.
29. Defendant denies the allegations contained in paragraph 29.
30. Defendant denies the allegations contained in paragraph 30.

B. Affirmative Defenses

31. Defendant avers it is a governmental entity organized and operating under the laws of the State of Texas. As a governmental entity, Defendant is not subject to punitive damages as alleged by Plaintiff.

Prayer

WHEREFORE, PREMISES CONSIDERED, Defendant prays the court to enter judgment that Plaintiff take nothing in this cause, dismiss Plaintiff's suit with prejudice, assess costs against Plaintiff, and award Defendant all relief to which it is justly entitled.

Respectfully submitted,

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BY: 

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CERTIFICATE OF SERVICE

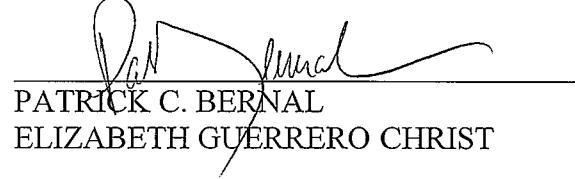
I, the undersigned, do hereby certify and attest that all parties in interest listed below have received a true and correct copy of this motion by certified mail, electronic receipt requested, postage prepaid, or by **electronic mail from the Clerk of the Court**.

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